

EXHIBIT 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
No. 25-cv-22896-KMW

FRIENDS OF THE EVERGLADES, INC., et al.,

Plaintiffs,

v.

KRISTI NOEM, et al.,

Defendants.

DECLARATION OF IAN GADEA-GUIDICELLI

I, Ian Gadea-Guidicelli, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct based on my personal knowledge. I am over 18 years old and, if called, I could and would testify to the information provided herein.

1. I am the State Emergency Response Team (SERT) Chief and Bureau Chief of Response at the Florida Division of Emergency Management (FDEM). I am charged with supervising and coordinating FDEM's day-to-day operations at the detention facility located within the Dade-Collier Training and Transition Airport (TNT). My duties require that I be intimately familiar with FDEM's financial obligations related to the TNT detention facility.

2. On August 21, 2025, FDEM was ordered to remove "1) the temporary fencing installed by Defendants to allow Tribe members access to the site consistent with the access they enjoyed before the erection of the detention camp; 2) the Sunbelt lighting fixtures and any additional lighting installed for the use of the property as a detention facility; and 3) all generators, gas, sewage, and other waste and waste receptacles that were installed to support this project."

Doc. 131 at 81.

3. Based on my experience with FDEM's financing of the facility and conversations with FDEM's vendors, I anticipate that complying with those requirements will cost roughly \$15-20 million. And if FDEM is ultimately permitted to reopen the facility, I anticipate that FDEM would again need to spend about \$15-20 million to reinstall the structures it was forced to remove under the district court's order.

4. In addition, FDEM was prohibited from "(1) installing any additional industrial-style lighting (described by witnesses as "Sunbelt" lighting); or doing any paving, filling, excavating, or fencing; or doing any other site expansion, including placing or erecting any additional buildings, tents, dormitories, or other residential or administrative facilities on the TNT site; and (2) bringing any additional persons onto the TNT site who were not already being detained at the site at the time of this Order going into effect." Doc. 131 at 80. That order will eventually cause all detention operations at the site to cease. In that event, FDEM will lose most of the value of the \$218 million it invested to make TNT suitable for detention operations.

5. As a result, the \$100 that Plaintiffs have been required to post as a bond will not cover the costs of complying with the injunction.

Executed on August 23, 2025, in Tallahassee, Florida.



Ian Gadea-Guidicelli
SERT Chief and Bureau Chief of Response
Florida Division of Emergency Management